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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT REPORT FOLLOWING AUGUST
30, 2024 CONFERENCE ON
ADMINISTRATIVE MOTION RE CASE
SCHEDULE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 In response to the guidance provided by the Court during the August 30, 2024 videoconference,
 2 the parties have conferred further and agreed upon a shorter proposed extension of the case schedule for
 3 the Court's consideration. Whereas the parties' joint administrative motion requested a six-month
 4 extension of the case schedule, the parties' alternative proposed schedule, set forth below, would extend
 5 the case schedule by only four months. If these dates are acceptable to the Court, the parties can submit
 6 this schedule in the form of a proposed order:

<i>Pretrial Event</i>	<i>Current Date</i>	<i>Stipulated Alternative¹</i>
Substantial Completion of Document Production	September 20, 2024	November 5, 2024
Close of Fact Discovery	December 20, 2024	April 4, 2025
Joint Status Report on Protocol for Production of Expert-Related Documents	January 13, 2025	April 21, 2025
Non-Case-Specific and Causation Experts: Plaintiffs' Opening Reports	January 31, 2025	May 16, 2025
Case-Specific Experts: Plaintiffs' Opening Reports	January 31, 2025	May 19, 2025
Identification of Bellwether Trial Pools	February 6, 2025	May 23, 2025
Hearing re Identification of Bellwether Trial Pools	February 10, 2025	June 6, 2025
Non-Case-Specific and Causation Experts: Defendants' Responsive Reports ²	February 28, 2025	July 9, 2025
Case-Specific Experts Defendants' Responsive Reports	March 3, 2025	July 11, 2025
Non-Case-Specific and Causation Experts: Plaintiffs' Rebuttal Reports	March 14, 2025	July 30, 2025
Case-Specific Experts Plaintiffs' Rebuttal Reports	March 17, 2025	August 1, 2025
Close of Expert Discovery	April 7, 2025	August 27, 2025
Exchange Preliminary Witness Lists	April 21, 2025	September 10, 2025
Exchange Preliminary Proposed Jury Instructions	May 2, 2025	September 22, 2025

21
 22 ¹ Compared to the parties' prior proposed schedule, the stipulated alternative schedule shortens fact
 23 discovery by four weeks; reduces the time between close of fact discovery and Plaintiffs' expert reports
 24 by one week; reduces the time between Plaintiffs' expert reports and Defendants' responsive reports by
 25 one week; and reduces the time to file expert opposition and reply briefs by one week each. These
 26 modifications result in a trial date of February 10, 2026—four months after the Court's original trial date
 27 of October 14, 2025.

28 ² Defendants reserve the right to request earlier deadlines for general causation expert disclosures and
 29 associated Rule 702 and summary judgment briefing to align with any such earlier deadlines set by
 30 Judge Kuhl in the JCCP. Plaintiffs object to Defendants' reservation of rights and note that the Court
 31 has already considered and rejected Defendants' effort to "phase" general causation. See CMO No. 8,
 32 ECF No. 581 at 1-2.

<i>Pretrial Event</i>	<i>Current Date</i>	<i>Stipulated Alternative¹</i>
Deadline to Meet and Confer Regarding Whether Any Additional and Unanticipated Discovery May Be Needed on Disclosed Witnesses and to Develop a Plan for Completing Any Agreed-Upon Additional Discovery	May 2, 2025	September 22, 2025
Submit Joint Status Report on Results of Meet and Confer on Additional and Unanticipated Discovery on Disclosed Witnesses	May 5, 2025	September 24, 2025
Dispositive and Rule 702 (<i>Daubert</i>) Motions: Opening Briefs	May 7, 2025	September 24, 2025
Submit Joint Letter Brief on Any Remaining Discovery Disputes on Disclosed Witnesses	May 9, 2025	September 29, 2025
File Proposed / Disputed Jury Instructions and Additional Questions for Juror's Survey Monkey Questionnaire	May 30, 2025	October 27, 2025
Dispositive and Rule 702 (<i>Daubert</i>) Motions: Opposition Briefs	June 4, 2025	October 27, 2025
Dispositive and Rule 702 (<i>Daubert</i>) Motions: Reply Briefs	June 18, 2025	November 25, 2025
Hearing on Order in which Bellwether Cases Will Be Tried	June 27, 2025	December 3, 2025
Dispositive and Rule 702 (<i>Daubert</i>) Motions: Hearing	July 16, 2025	December 19, 2025
Exchange of Initial Pretrial Disclosures per the Court's Standing Order	September 5, 2025	January 6, 2026
Submit Joint Statement Regarding Pretrial Meet and Confer Compliance	September 5, 2025	January 6, 2026
Compliance Deadline	September 12, 2025	January 13, 2026
Joint Trial Submissions per the Court's Standing Order	September 18, 2025	January 19, 2026
Pretrial Statement	September 26, 2025	January 19, 2026
Pretrial Conference	October 3, 2025	February 3, 2026
Jury Selection and Start of Trial	October 14, 2025	February 10, 2026

Pursuant to the Court's order during the August 30, 2024 videoconference, the parties identify below the anticipated discovery activities that would take place from now through April 4, 2025 (the parties' proposed fact discovery cut-off), should the Court grant their requested extension. Section I sets forth the anticipated fact discovery activities in each month, broken down by party. Section II sets forth a summary of anticipated expert discovery activities.

A more fulsome summary of the status of discovery to date will be contained in the parties' forthcoming Discovery Management Conference Statement (to be filed September 6, 2024), and the

1 parties refer the Court to their forthcoming CMC Statement for additional narrative descriptions of
 2 anticipated fact and expert discovery activities, should that additional detail be helpful to the Court. The
 3 parties each reserve their rights to challenge any and all of the various discovery activities identified by
 4 the opposing party below, including for relevance, burden, and proportionality.³

5 **I. Anticipated Fact Discovery Activities**

6 **September 2024**

7 • **Defendants**

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- Meta will substantially complete production of custodial files for P.R., R.S., K.H., P.A.D., M.G.S., K.J., J.C., and J.G., and will produce privilege logs and any documents downgraded through the privilege log process for A.D., C.S., and K.A.
- YouTube will substantially complete production of custodial files of K.E., E.T., K.O., J.R., A.W.P., and T.K., and will produce an additional year of files from A.W.P. and F.G. after September 20, consistent with the parties' discussions.
- TikTok will substantially complete production of: Mandarin custodial files for A.C., J.Y., and R.L.; non-Mandarin custodial files for C.C., Y.F., S.L., J.F., C.B., E.E., J.R., J.E., L.Y., and R.M.; and Mandarin custodial files for C.C., Y.F., S.L., and J.F.

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³ Defendants believe the schedule proposed in the parties' joint administrative motion was reasonable and justified, but agreed to the alternative schedule above in response to the Court's stated concerns and Plaintiffs' estimated dates for producing responsive documents. Defendants remain concerned that the proposed schedule is too aggressive and will not be achievable if Plaintiffs do not meet those dates, and does not permit Defendants adequate time to take offensive discovery (particularly, depositions) of critical personal injury ("PI") and school district ("SD") witnesses, given the volume of documents and other highly relevant data (e.g., forensic device imaging) that has yet to be produced, and the number of individuals Plaintiffs have identified as possessing "unique" information relevant to the case. Defendants reserve the right to argue in their forthcoming DMC Statement that Plaintiffs should be making more accelerated productions.

Plaintiffs object to Defendants' inclusion of the prior sentence, for several reasons. First, it exceeds the Court's direction that the parties not engage in advocacy in this filing and instead merely provide the Court with "succinct ... bullet point[s]." *See* ECF No. 1106. Second, all parties have reserved their rights to challenge specific discovery activities proposed by an opposing party in this filing for any reason, regardless of whether specifically mentioned here. *See supra*. Third, Defendants cannot at the same time (i) stipulate to a proposed schedule and (ii) reserve their rights to challenge it separately. That attempted "reservation" undermines the collaborative process the Court directed the parties to undertake. Plaintiffs themselves have numerous concerns about Defendants' ability to meet their stated production deadlines, but refrain from argumentation in this filing.

- 1 • Snap will continue its agreed-upon rolling productions with an additional production on
2 September 20, including documents from all agreed-upon custodians. (Snap substantially
3 completed productions of custodial files for J. Be, J. Bo, and J.S. in August.)
- 4 • **Plaintiffs**
 - 5 • PI/SD Plaintiffs will identify the 6 remaining custodians that PI/SD Plaintiffs have not yet
6 identified as to Snap, and the 5 remaining custodians that Plaintiffs have not yet identified as
7 to TikTok.
 - 8 • PI Bellwether Plaintiffs N.K. (on behalf of S.K.) and Klinten Craig will substantially
9 complete productions.
 - 10 • SD Plaintiffs will finalize negotiations on search terms for SD Bellwether Plaintiffs and
11 submit any remaining disputes to the Court.
 - 12 • SD Bellwether Plaintiffs will substantially complete document productions for the following
13 witnesses identified by Defendants as anticipated deponents: Shelly Pettiford,⁴ Kycied Zahir,
14 April Vaus, and Darnell Mangan (Irvington Public Schools); Christina Alton, Deborah Judd,
15 and Buzz Williams (Board of Education of Harford County); Karen Chase, Mary Donahue,
16 Emily Sortino, Peter Daquila, Vin D'Elia, and Connor Henderson (School District of the
17 Chathams); Kera Howard, Hannah Watts, Daphne Noble, Jeremy Hall, Kansas Adams-Allen,
18 and Kelli Gross (Breathitt County School District); Twila Wilson, Fronde Stille, Elah Hudon,
19 Erin O'Conal, Dr. Joseph Williams, Ellen Nitz, and Alicia Kokkinis (Charleston County
20 School District); Byron Schueneman, Denise Revels, Darnell Logan, Kishia Towns, and
21 Norman Sauce (Dekalb County School District); Anthony Godfrey, Travis Hamblin, John
22 Larsen, Fulvia Franco, Sharon Jensen, and Jared Covili (Board of Education of Jordan
23 School District); Ken Kiser (Spartanburg 6 School District); Van Ayres, Gary Brady, Rob
24 Nelson, Shellie Blackwood-Green, and Johan von Ancken (School Board of Hillsborough
25 County); Anna Schwartz-Warmbrand, Julie Shivanonda, Rebecca Carrier, Vanessa Aguayo,
26 Ricardo Hernandez, and Dr. Gabriel Trujillo (Tucson Unified School District); and Chris
27 Dougherty and Theresa Jones (Baltimore City Board of School Commissions).

20 **October 2024**

- 21 • **Defendants**
 - 22 • Meta will substantially complete production of custodial files for the remaining custodians
23 (of the 39 total custodians) who were identified as anticipated deponents by Plaintiffs as of
24 August 20.

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27 ⁴ All custodial file production timelines for school district custodians provided herein assume that the
28 search terms most recently communicated to Defendants by the SD Plaintiffs apply, and that Defendants
 do not seek to expand further the list of custodians.

- 1 • Snap will make additional document productions and will substantially complete production
2 of custodial files for M.J., J.S., K.W., N.Y., and D.L.
- 3 • TikTok will substantially complete production of Mandarin custodial files for C.B., E.E.,
4 J.R., J.E., L.Y., and R.M.
- 5 • TikTok will substantially complete production of non-Mandarin custodial files for W.Z.,
6 M.T., M.W., V.P., E.H., J.D., V.M., T.E., S.G., A.Z., and F.Z.
- 7 • **Plaintiffs**
 - 8 • Plaintiffs will depose 4 Meta witnesses: D.C., C.S., M.S., and K.J.
 - 9 • Plaintiffs will depose 4 TikTok witnesses: A.C., C.C., E.E., and R.L.
 - 10 • Plaintiffs will depose 2 Snap witnesses: N.Y. and M.J.
 - 11 • PI Bellwether Plaintiffs M.M. (on behalf of B.M.) and Lorine Hawthorne (individually and
12 on behalf of B.H.) will substantially complete document productions.
 - 13 • The SD Bellwether Plaintiffs will substantially complete document productions for the
14 following witnesses identified by Defendants as anticipated deponents: Michael LaSusa and
15 Lydia McIntosh-Haye (School District of the Chathams); Dr. Omar Daniels, Dr. Alan Eggert,
16 Dr. Justin Funderburk, and Dr. Mark Smith (Spartanburg 6 School District); Shavonna
17 Coakley, Lisa Allison, Megan Bocchino, Anita Huggins, Michael Reidenbach, and Buffy
18 Roberts (Charleston County School District); Ken Oertling, Jerry Smith, Ronald White,
19 Stephanie Steib, Kelsey Hegel, and John Rome (St. Charles Parish Public Schools); John
20 Amberg and Michael Bussacco (Irvington Public Schools); Devon Q. Horton, Michelle
21 Dillard, Deboarh Moore-Sanders, Kimberly Frankin, and Kiana King (Dekalb County School
22 District); Stacy McKnight, Phillip Watts, Aaron McIntosh, and William Noble (Breathitt
23 County School District); Dr. Courtney Pate, Sabree Barnes, and Luanda Johnson (Baltimore
24 City Board of School Commissions); Brad Sorensen, Stacee Worthen, McKinley Withers,
25 and Carolyn Gough (Board of Education of Jordan School District); Leah Armstrong, Kim
26 Bays, Tracye Brown, Rick Graves, Myrna Hoge, Michael Kelleher, and Holly Saia (School
27 Board of Hillsborough County); and Frank Armenta, Karla Escamilla, Joseph Gaw, Lacey
28 Grijalva, Joseph Hallums, and Blaine Young (Tucson Unified School District).

22 **November 2024**

- 23 • **All Parties**
 - 24 • All Parties (in both the MDL and JCCP proceedings) will finalize, and, if necessary, brief, all
25 disputes about the scope of Defendants' written responses and objections to Plaintiffs'
26 existing discovery requests.

1 • **Defendants**

2 • Meta will substantially complete its production of documents; and will produce privilege logs
 3 and any documents downgraded through the privilege log process for P.R., R.S., K.H.,
 4 P.A.D., M.G.S., K.J., J.C., J.G., M.R., D.C. and all other custodians who were identified as
 5 anticipated deponents by Plaintiffs as of August 20.

6 • Snap will substantially complete its production of documents.

7 • YouTube will substantially complete its production of documents.

8 • TikTok will substantially complete production of all remaining custodial files and
 9 documents, including Mandarin custodial files for W.Z., M.T., M.W., V.P., E.H., J.D., V.M.,
 10 T.E., S.G., A.Z., and F.Z.

11 • Based on the SD Bellwethers' estimates herein of when they will produce custodial files for
 12 certain anticipated deponents, and the expected volume of produced documents, Defendants
 13 expect to take 5-10 depositions of school district witnesses in late November.

14 • If the PI Bellwethers' estimated custodial file production timelines are met, Defendants
 15 expect to take approximately 12 depositions in the PI Bellwether cases in November.

16 • Based on the AGs' estimates herein of when they will substantially complete document
 17 productions, and the pendency of the parties' dispute regarding Meta's ability to take party
 18 discovery of State agencies, Meta expects to take 5-10 depositions across the States in
 19 November.⁵

20 • **Plaintiffs**

21 • PI Bellwethers, SD Bellwethers, and AGs will substantially complete production of
 22 documents.

23 • Plaintiffs will review documents produced by Defendants on November 5, the volume of
 24 which remains unknown to Plaintiffs, but which Plaintiffs expect to number in the millions.

25 • Plaintiffs will depose 6 Meta witnesses: M.R., K.H., P.D., J.G., K.A., and J.C.

26 • Plaintiffs will depose TikTok witness J.Y., as well as an anticipated 4-6 additional TikTok
 27 witnesses.

28 • Plaintiffs will depose approximately 3 YouTube witnesses previously identified as priority
 29 custodians.

⁵ If Judge Kang resolves the parties' dispute regarding State agency discovery in the AGs' favor, Meta anticipates needing to take at least 70 additional depositions beyond those reflected in these bullets. The State AGs reserve all rights to object to these depositions.

- 1 • Plaintiffs will depose Snap witness A.T., as well as an anticipated two additional Snap
2 witnesses.
- 3 • SD Bellwether Plaintiffs will substantially complete document productions for the following
4 witnesses identified by Defendants as anticipated deponents: Jesse Bailey and Jessica
5 Howard (Breathitt County School District); Kade Rogers, Charmaine Williams, Stevie
6 Stillinger, Patrick O’Malley, Tamika Green, Erin Granier, Tresa Webre, Angelle Babin,
7 Regina McMillan, and David Schexanydre (St. Charles Parish Public Schools); Michael
8 Anderson and Bryce Dunford (Board of Education of Jordan School District); Dr. Sherry
9 Eppelsheimer (Charleston County School District); Vasanne Tinsley, Cheryl Watson-Harris,
10 Stephen Green, Charles Burbridge, Masana Maillard, Michael Bell, JoAnn Harris, and Joyce
11 Morley (Dekalb County School District); Reginald Lamptey (Irvington Public Schools); Lori
12 Gironda (School District of the Chathams); Bryant Roberson, Jennifer Sims, Caleb Thrower,
13 Dr. Maddie Jurek, Darrell Belgrave, Cynthia Robinson, Brian Calsing, and Shawn Wootten
14 (Spartanburg 6 School District); Dr. Sonja Brookins Santelises, Ketia Stokes, Lori Hines,
15 Taiisha Swinton-Buck (Baltimore City Board of School Commissioners); Karen Perez,
16 Tanya Arja, Marie Whelan, and Romaneir Johnson (School Board of Hillsborough County);
17 and Bernard Hennigan, Sean Bulson, Joseph Harbert, Mary Beth Stapleton, Michael O’Brien,
18 Barbara Canavan, Joseph Schmitz, Patti Jo Beard, Drew Moore, and Jillian Lader (Board of
19 Education of Harford County).

13 **December 2024**

14 • **Defendants**

- 15 • Meta will produce privilege logs and any documents downgraded through the privilege log
16 process for all other Meta custodians.
- 17 • Based on the SD Bellwethers’ estimates herein of when they will produce custodial files for
18 certain anticipated deponents, the expected volume of produced documents, and holiday
19 schedules, Defendants expect to take 10-15 depositions of school district witnesses in
20 December.
- 21 • Based on the PI Bellwethers’ estimated custodial file production timelines, Defendants
22 expect to take approximately 12 depositions of PI Bellwethers and third parties in December.
- 23 • Based on the AGs’ estimates herein for when they will substantially complete document
24 productions, and the pendency of the parties’ dispute regarding the Meta’s ability to take
25 party discovery of State agencies, Meta expects to take 5-10 depositions across the States in
26 December.

27 • **Plaintiffs**

- 28 • Plaintiffs will depose 3 Meta witnesses: R.S., D.K., and P.R.
- Plaintiffs will depose approximately 3 YouTube witnesses previously identified as priority
 custodians.

- 1 • Plaintiffs will depose 4-6 TikTok witnesses.
- 2 • Plaintiffs will depose 4 Snap witnesses.

3 **January 2025**

- 4 • **Plaintiffs**
 - 5 • Plaintiffs anticipate depositing 10 Meta witnesses.
 - 6 • Plaintiffs anticipate depositing 4-8 TikTok witnesses.
 - 7 • Plaintiffs anticipate depositing 4-8 Snap witnesses.
 - 8 • Plaintiffs will depose approximately 4 YouTube witnesses previously identified as priority
 - 9 custodians and 1-2 additional YouTube witnesses.
- 10 • **Defendants**
 - 11 • Defendants anticipate taking 25-40 depositions of school district witnesses in January.
 - 12 • Based on the PI Bellwethers' estimated custodial file production timelines, Defendants
 - 13 expect to take approximately 16 depositions of third parties in January.
 - 14 • Based on the AGs' estimates herein for when they will substantially complete document
 - 15 productions, and the pendency of the parties' dispute regarding the Meta's ability to take
 - 16 party discovery of State agencies, Meta expects to take 20-25 depositions across the States in
 - 17 January.

18 **February 2025**

- 19 • **All Parties**
 - 20 • The parties (in both the MDL and JCCP proceedings) will serve all remaining Interrogatories
 - 21 and Requests for Admission (with the understanding that any party may petition the
 - 22 appropriate Court to show good cause why it is necessary to serve such additional discovery
 - 23 after February 14, 2025).
- 24 • **Defendants**
 - 25 • Defendants anticipate taking 25-40 depositions of school district witnesses in February.
 - 26 • Based on the PI Bellwethers' estimated custodial file production timelines, Defendants
 - 27 expect to take approximately 16 depositions of third parties in February.
 - 28 • Based on the AGs' estimates herein for when they will substantially complete document
 - 29 productions, and the pendency of the parties' dispute regarding the Meta's ability to take

1 party discovery of State agencies, Meta expects to take 20-25 depositions across the States in
 2 February.

3 • **Plaintiffs**

4 • Plaintiffs anticipate deposing 10 additional Meta witnesses, and the State AGs will take up to
 5 3 additional AG-specific depositions of Meta witnesses if needed.

6 • Plaintiffs anticipate deposing 4-8 TikTok witnesses.

7 • Plaintiffs anticipate deposing 4-8 Snap witnesses.

8 • Plaintiffs will depose approximately 4 YouTube witnesses previously identified as priority
 9 custodians and 1-2 additional YouTube witnesses.

10 **March 2025**

11 • **Plaintiffs**

12 • Plaintiffs anticipate deposing up to 10 Meta witnesses, and the State AGs will take up to 3
 13 AG-specific depositions of Meta witnesses if needed.

14 • Plaintiffs anticipate deposing 4-8 TikTok witnesses.

15 • Plaintiffs anticipate deposing 4-8 Snap witnesses.

16 • Plaintiffs will depose approximately 4-5 YouTube witnesses.

17 • **Defendants**

18 • Defendants anticipate completing document productions in March.

19 • Defendants anticipate taking 25-40 depositions of school district witnesses in March.

20 • Based on the PI Bellwethers' estimated custodial file production timelines, Defendants
 21 expect to take approximately 16 depositions of third parties in March.

22 • Based on the AGs' estimates herein for when they will substantially complete document
 23 productions, and the pendency of the parties' dispute regarding the Meta's ability to take
 24 party discovery of State agencies, Meta expects to take 20-25 depositions across the States in
 March.

25 **II. Anticipated Expert Discovery Activities**

26 The parties set forth below anticipated expert discovery deadlines over four discrete periods under
 27 their alternative proposed schedule.

1 **April 4, 2025 through May 19, 2025**

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- The PI/SD Plaintiffs will prepare opening reports for approximately 20 experts, and the State AGs will prepare opening reports for approximately 8 AG-specific experts.

1 **May 19, 2025 through July 3, 2025**

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- Defendants will prepare responsive reports for an anticipated minimum of approximately 24 experts.

1 **July 3, 2025 through July 24, 2025**

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- Plaintiffs will prepare rebuttal reports for an anticipated 20 experts, and the State AGs will prepare rebuttal reports for an anticipated 8 AG-specific experts.

1 **July 24, 2025 through August 27, 2025**

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- The Parties will take and defend the depositions of approximately 50 anticipated experts, averaging 10 depositions per week during this period.

1 Respectfully submitted,

2 DATED: September 4, 2024

By: /s/ Previn Warren

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1 **ATTESTATION**

2 I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence
3 to the filing of this document has been obtained from each signatory hereto.

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5 Dated: September 4, 2024

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